REMARKS

In reply to the Office Action dated March 27, 2003, Applicants cancel claims 2 and 12 and amend claims 1, 3-9, 11, and 13-19. Applicants submit that no new matter has been introduced by amendments to claims 1, 3-9, 11, and 13-19. Claims 1, 3-11, and 13-19 are now pending in the application.

Claims 1, 11, and 19 stand rejected under 35 U.S.C. §102(e) as being anticipated by <u>Bienvenu</u> et al. (U.S. Patent No. 6,526,438). Claims 2-10 and 12-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over <u>Bienvenu</u> et al. (U.S. Patent No. 6,526,438) in view of <u>Brown</u> et al. (U.S. Patent No. 5,941,947). Applicants amend claims 1, 11, and 19 to included the language from claims 2 and 12. Applicants submit that the pending claims, as amended, are patentable over <u>Bienvenu</u>, and are further patentable over <u>Bienvenu</u> in view of <u>Brown</u>.

Bienvenu discloses a method for distributing timely information in an information distribution system comprising a group of restricted publication sources, a group of authorized subscribers to the publications, an information management enterprise (IME) having an information processing, storage and distribution control center, and a publicly accessible global information network accessible to all of the parties. The restricted publication sources disseminate publications destined to reach a list of subscribers who are authorized to receive the publications. The publications are received by, processed in and distributed through an information processing, storage and distribution control center (IPSDCC) of the information management enterprise. The IPSDCC has a computer with relational database storage means for storing a content database, a log entry database, and an entitlement database. Facilities of the IME also include a network distribution server. The authorized subscribers each have access to computer

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local area networks including a local server with SQL software adapted to answer subscriber queries from an updateable relational database residing on the local server. (See, Col. 3, II. 25-48).

Bienvenu does not disclose or suggest a database having a directed group structure in which clients and events are assigned to groups such that clients assigned to a particular group are eligible for events assigned to the particular group as well as events assigned to all ancestor groups of the particular group, as recited in independent claims 1, 11, and 19, as amended. Accordingly, the pending claims are patentable over a Bienvenu.

Brown discloses a system and method for controlling user access to data entities in a computer network. (See, Col. 2, II. 19-25). Different users of the network are given different access rights with respect to different content objects. One feature of the system discloses that the access rights of users of the network with respect to various user-accessible content objects are specified by access rights data that is stored within an access rights database. The access rights database is implemented as a relational database on one or more security servers, which are connected to the application servers by a local area network. The access rights data is stored within the relational database in association with multiple content category identifiers, or "tokens," which identify categories or groupings of content objects (such as "internal public data," "Internet public data," and "18-and-older only data") for security purposes. The content categories serve the basic content units to which user access rights may be specified (See, Col. 3, II. 58-Col. 4, II. 11).

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However, <u>Brown</u> does not disclose or suggest a database having a directed group structure in which clients and events are assigned to groups such that clients assigned to a particular group are eligible for events assigned to the particular group as well as events assigned to all ancestor groups of the particular group. Although <u>Brown</u> discloses groups associating access rights data with various users, <u>Brown</u> does not disclose or suggest that users assigned to a particular group are eligible to access objects assigned to the particular group as well as objects assigned to all ancestor groups of the particular group.

As discussed above, <u>Bienvenu</u> does not disclose or suggest a database having a directed group structure in which clients and events are assigned to groups such that clients assigned to a particular group are eligible for events assigned to the particular group as well as events assigned to all ancestor groups of the particular group.

Therefore, any combination of <u>Bienvenu</u> and <u>Brown</u> also would not disclose or suggest such a limitation. Accordingly, the pending claims are patentable over <u>Bienvenu</u> in view of <u>Brown</u>.

In summary, Applicants submit that independent claims 1, 11, and 19 are patentable over <u>Bienvenu</u>, and are further patentable over <u>Bienvenu</u> in view of <u>Brown</u>. Claims 3-10 depend from claim 1 and include additional limitations. Therefore, claims 3-10 are also patentable. Similarly, because claims 13-18 depend from claim 11 and include additional limitations, claims 13-18 are also patentable.

In view of the foregoing remarks, Applicants submit that this claimed invention is neither anticipated nor rendered obvious in view of the references cited against this application. Applicants therefore request the entry of this Amendment, the Examiner's

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reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Applicants would like to point out that we have changed the attorney number for this matter to <u>7451.0031-00000</u>. The undersigned requests that the Examiner update the PTO's electronic records (including PAIR) to reflect this change.

If the Examiner believes a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Karna J. Nisewaner at (650) 849-6643.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: September 12, 2003

Bv:

Karna J. Nisewaner Reg. No. 50,665

FINNEGAN HENDERSON FARABOW GARRETT & DUNNER LLP